

RECEIVED  
SERVED ON  
COUNSEL/PARTIES OF RECORD

JAN 31 2022

CLERK US DISTRICT COURT  
DISTRICT OF NEVADA

FILED

DEPUTY

Dated: \_\_\_\_\_

U.S. MAGISTRATE JUDGE  
DISTRICT OF NEVADA

By: \_\_\_\_\_ JA/DEPUTY

1 CHRISTOPHER CHIOU  
 2 Acting United States Attorney  
 3 District of Nevada  
 4 Nevada Bar Number 14853  
 MEGAN RACHOW  
 Assistant United States Attorney  
 5 Nevada Bar Number 8231  
 6 400 South Virginia, Suite 900  
 Reno, Nevada 89501  
 Phone: (775) 784-5438  
Megan.Rachow@usdoj.gov

7 *Representing the United States of America*

8  
 9 UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

3:22-MJ-0018-CLB

11 Plaintiff,

COMPLAINT FOR VIOLATIONS OF:

12 v.

Title 18, United States Code, Section  
2113(a) – Bank Robbery (Count One);

14 DEVON JONES,

Title 18, United States Code, Sections  
924(c)(1)(A)(iii)—Discharging a Firearm  
During and in Relation to a Crime of  
Violence

15 Defendant.

18 BEFORE the Honorable Carla L. Baldwin, United States Magistrate Judge, Reno,  
 19 Nevada, the undersigned complainant being first duly sworn states:

20 COUNT ONE

21 Bank Robbery  
 (18 U.S.C. § 2113(a))

22 On or about January 27, 2022, in the State and Federal District of Nevada,

23 DEVON JONES,

1 defendant, herein, by force, violence, and intimidation, did take from the person and  
2 presence of a victim teller at the Plumas Bank located at 1100 North Carson Street,  
3 Carson City, approximately ten thousand dollars (\$10,000) in United States currency,  
4 belonging to and in the care, custody, control, management, and possession of Plumas  
5 Bank, the deposits of which were then insured by the Federal Deposit Insurance  
6 Corporation; all in violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

**Discharging a Firearm During and in Relation to Crime of Violence  
(18 U.S.C. § 924(c)(1)(A)(iii))**

On or about January 27, 2022, in the States and Federal District of Nevada,

DEVON JONES,

defendant herein, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Bank Robbery, as charged in Count One of this Complaint, knowingly used and carried a firearm, that is: a black semi-automatic 9mm pistol, said firearm being discharged, in violation of Section 924(c)(1)(A)(iii).

Complainant as a Special Agent with the Federal Bureau of Investigation states there is probable cause to arrest the above-named defendant as set forth in the attached affidavit.

111

111

111

**FILED**

3:22-MJ-00018-CLB

Dated: \_\_\_\_\_

U.S. MAGISTRATE JUDGE  
DISTRICT OF NEVADA

By: \_\_\_\_\_ JA/DEPUTY

1                   **AFFIDAVIT IN SUPPORT OF**  
2                   **AN APPLICATION FOR AN ARREST WARRANT**

3                   I, Erik G. Anderson, being first duly sworn under penalty of perjury, state as follows:

4                 1. I have been a special agent with the Federal Bureau of Investigation ("FBI")  
5                 for over 18 years. As part of my duties as a member of the Northern Nevada Safe Streets  
6                 Task Force at the Reno Resident Agency, I investigate bank robberies, crimes of violence,  
7                 gang related crimes, and other violations of federal law. The statements contained in this  
8                 affidavit are based upon my experience and background as a Special Agent. I have also  
9                 conferred with other investigators about this investigation.

10                2. The statements contained in this affidavit are based on my experience and  
11                 background as a Special Agent and on information provided by other agents, law  
12                 enforcement officers, and witness interviews. Since this affidavit is being submitted for the  
13                 limited purpose of securing an arrest warrant, I have not set forth every fact resulting from  
14                 the investigation; rather, I have set forth a summary of the investigation to date in order to  
15                 establish probable cause to charge DEVON JONES, with a violation of Title 18, United  
16                 States Code, Sections 2113(a), Bank Robbery and a violation of Title 18, United States  
17                 Code, Section 924(c)(1)(A)(iii), Discharging a Firearm During and In Relation to a Crime of  
18                 Violence.

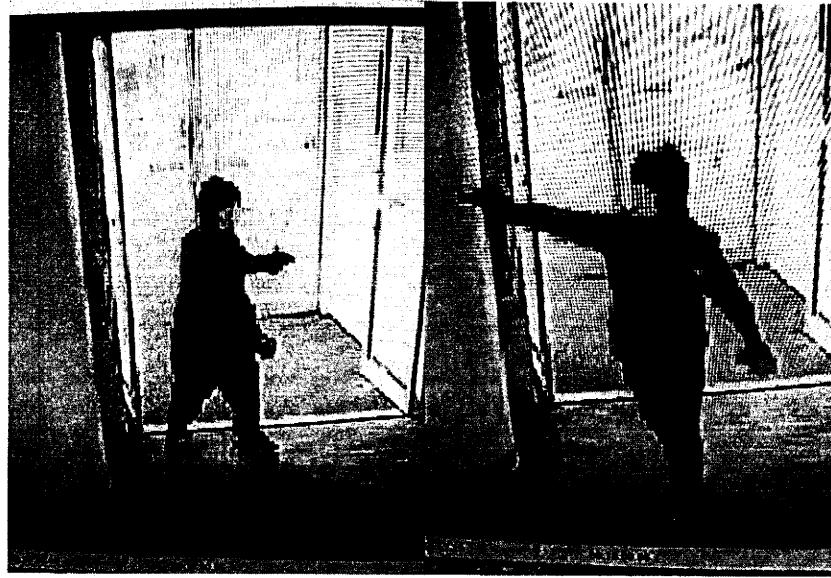
19                3. Because this affidavit is being submitted for the limited purpose of securing an  
20                 arrest warrant, I have not included each and every fact known to me concerning this  
21                 investigation. Information set forth in this affidavit is based not only on my personal  
22                 investigation, but also on information provided to me from other law enforcement  
23                 investigators, including but not limited to deputies from the Carson City Sheriff's Office  
24                 (CCSO), officers from the Las Vegas Metropolitan Police Department (Metro) and Special

1 Agents and Task Force Officers with the Federal Bureau of Investigation (FBI). I have set  
2 forth only those facts that I believe are necessary to establish probable cause for the arrest of  
3 DEVON JONES.

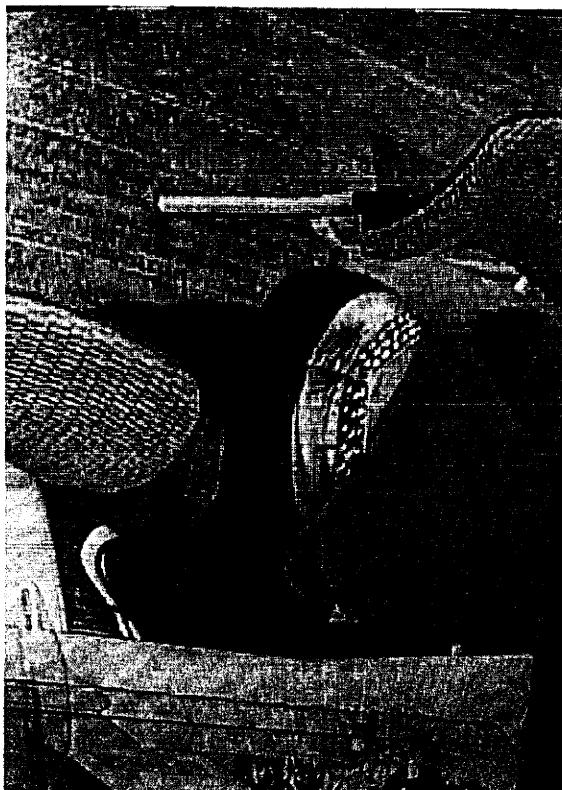
4 **PROBABLE CAUSE STATEMENT**

5 4. On January 27, 2022, at approximately 9:15 a.m., a masked adult male  
6 wearing a blue surgical mask, black gloves, a black hood, blue jacket, black pants and blue  
7 running shoes and carrying a semiautomatic pistol (subject) entered the Plumas Bank  
8 located at 1100 N. Carson Street, Carson City, Nevada (target bank). The following are  
9 screen captures of the subject from bank surveillance video just prior to, and just after  
10 entering the bank:





5. After the subject entered the bank, he started yelling and fired a round. He  
then approached the female victim teller and yelled, "Where's the money? Give me the  
fucking money!" He repeated this demand three times. The victim teller, in fear for her life,  
took the money from her top cash teller drawer and gave it to the subject. The subject  
grabbed the money and said, "This isn't enough." The victim teller then opened her second  
teller cash drawer and handed the subject stacks of cash secured by thick blue rubber bands,  
thin blue rubber bands and tan rubber bands. In the process of grabbing the cash, the subject  
accidentally dropped a large quantity of the cash on the floor. He then placed his  
semiautomatic pistol on a chair and reached down to pick up the money on the floor. The  
following are two screen captures from the bank surveillance video of the subject wearing a  
blue studded belt with faded jeans and black sweatpants, bending over to pick up the  
money:



23       6.     The subject then looked up, noticed blue lights flashing from the ceiling, and  
24     yelled, "Who hit the alarm? I will fucking kill you!" He repeated this, pointed his gun at

1 one of the bank employees and fired, missing the employee. The subject then yelled, "I will  
2 kill you bitch! I will fucking shoot you!"

3       7.     The subject waived the gun around, pointing it at several other employees, all  
4 of whom had their hands in the air. The subject then yelled, "Get on the fucking ground, I  
5 will shoot you," to everyone. Before departing, he fired a third round. He then departed  
6 the bank on foot. Witnesses observed the subject depart on foot to the northeast of the  
7 bank. A review of the bank surveillance cameras confirmed the subject's departure  
8 direction. A further review of the bank surveillance exterior camera revealed prior to  
9 entering the bank, the subject walked with a significant limp.

10       8.     The victim teller described the subject as black male, approximately 5'5", thin  
11 to medium build, approximately 35 to 40 years old. She was still visibly shaken during the  
12 interview.

13       9.     Responding law enforcement officers searched in the bank and identified  
14 three silver 9mm shell casings on the floor of the bank. They also deployed police K9s, who  
15 tracked from the bank and located a pistol and a \$100 bill on the lawn of the residence  
16 located at 124 N. Fall Street, at the northwest corner of the intersection of E. John St. and  
17 N. Fall St., approximately one block to the northwest of the target bank. The pistol, a  
18 semiautomatic 9mm Ruger, contained silver 9mm rounds.

19       10.    A review of video surveillance at Pioneer High School, located at E. 202  
20 Corbett Street, just to the north of 124 N. Fall Street, revealed that at approximately 9:19  
21 a.m., a black, late model Chevrolet Malibu drove by the school, northbound on N. Fall  
22 Street, from the direction of 124 N. Fall Street. The following is a screen capture of the  
23 vehicle from the Pioneer High School surveillance video:



11. A subsequent review of Carson City surveillance cameras revealed that  
12. between approximately 9:04 a.m. and 9:07 a.m., a black, late model Chevrolet Malibu  
13. without license plates, was observed driving in the vicinity of the target bank. Additional  
14. review of Carson City surveillance cameras revealed that at approximately 8:27 a.m., a  
15. black late model Chevrolet Malibu with California license plate 8LXA294, was observed  
16. driving southbound on N. Carson Street at the intersection of N. Carson Street and College  
17. Parkway. This is approximately 1 ½ miles to the north of the target bank. The following is  
18. a screen capture of the vehicle from the surveillance camera video:



12. A review of surveillance cameras from the Capital City Flats motel located at  
13. 801 N. Carson Street, revealed that at approximately 9:11 am., a black sedan stopped at the  
14. corner of Washington Street and N. Curry Street, a passenger appeared to exit the vehicle  
15. and depart on foot. This is less than a quarter of a mile to the south of the target bank.

16. 13. A records search revealed that California license plate 8LXA294 belongs to a  
17. 2020 Chevrolet Malibu registered to EAN Holdings LLC. A corporate records search  
18. revealed that EAN Holdings LLC is doing business as Enterprise-Rent-A-Car (Enterprise).  
19. Law Enforcement officers contacted Enterprise at the Reno International Airport. Agents  
20. with Enterprise confirmed that Enterprise did have a 2020 Black Chevrolet Malibu (the  
21. vehicle) in their fleet, that it was rented to a Shanequa Charles on January 25, 2022 at their  
22. branch office located at 3005 Mill Street in Reno, and that her rental agreement was valid  
23. through January 29, 2022.

24. 14. Based on the above information, on January 28, 2022, Carson City Sheriff's  
25. Office (CCSO) obtained a court order from the honorable James E. Wilson Jr., District  
26. Court Judge out of Carson City, for location data from the OnStar device located in the

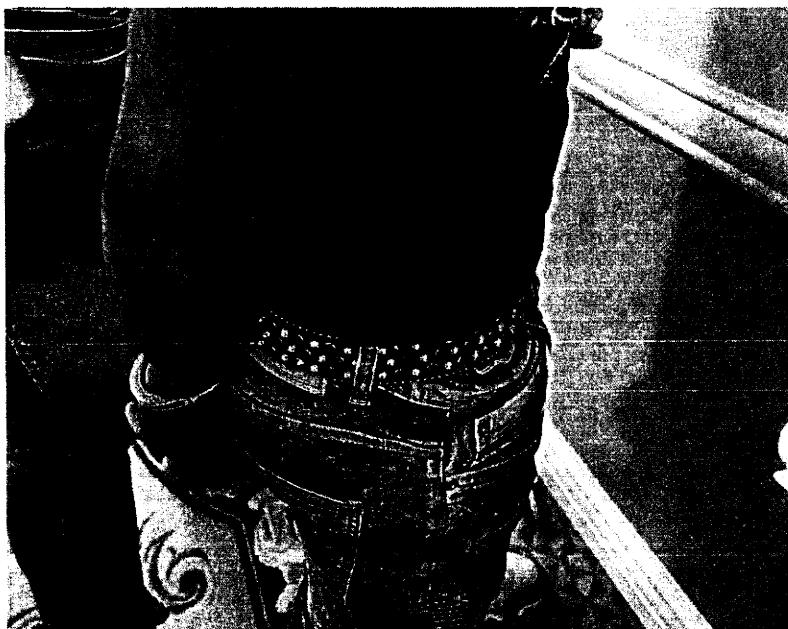
1 vehicle. Location pings for this device were received by CCSO beginning around 12:00  
2 p.m. on January 28, 2022. The pings revealed that the vehicle was located at the MGM  
3 Grand, located at 135 E. Harmon Ave., Las Vegas, Nevada.

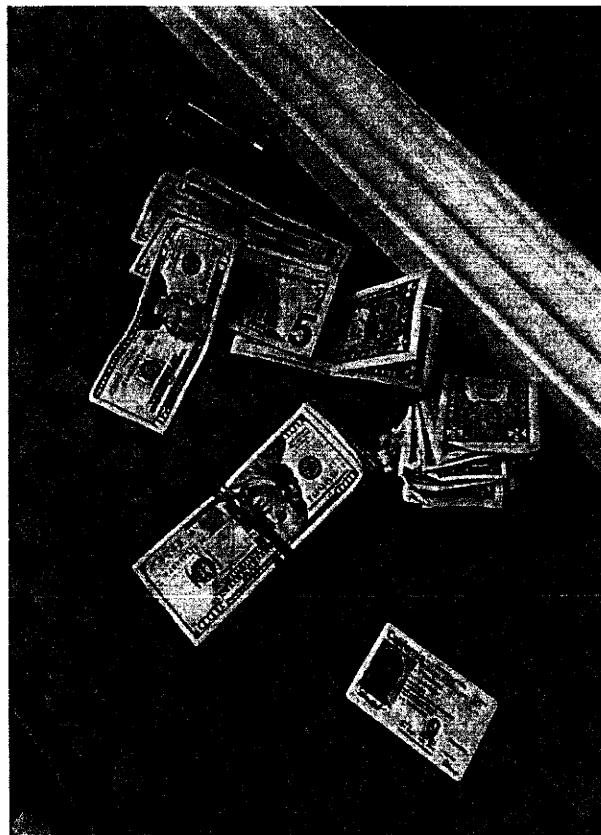
4 15. On January 28, 2022, based on the location data from OnStar, Members of  
5 the Federal Bureau of Investigation (FBI) led Las Vegas Criminal Apprehension Team  
6 (CAT) conducted a review of guests at the MGM Grand (the hotel) and observed that a  
7 Shanequa Charles was registered in room 36814 at the hotel and she listed a Devon Jones as  
8 her guest. A review of hotel surveillance cameras revealed that a black male adult and a  
9 black female resembling Shanequa Charles, were staying in this room. The black male  
10 appeared to walk with a significant limp. The following is a screen capture from the hotel  
11 video surveillance video of the black male adult with Shanequa Charles:



45 50

1       16. On the evening of January 29, 2022, MGM hotel security staff received a  
2 complaint of a disturbance at room 36814. Security staff, along with plain clothes officers from  
3 Metro, initially made contact with a black male adult who had been banging on the door of  
4 room 36814. During the conversation with the male individual, a Metro officer who was  
5 familiar with the Carson City bank robbery case, observed that the male individual was  
6 wearing a blue bejeweled belt. The Metro officer detained the individual and asked of the male  
7 individual for consent to search his person. The male individual consented and during the  
8 search, the officer located a large sum of cash in the individual's front right pants pocket and a  
9 quantity of methamphetamine in his front left pants pocket. The officers also observed a stack  
10 of cash that was secured by a thick blue rubber band. The following is a photo of the belt on  
11 the male individual and contents with the male individual:





17. The officer also located a California Identity Card for the individual  
18 identifying him as DEVON JONES, height 5'3", 155 pounds and 29 years old.

19. The female in room 36814 was identified as Shanequa Charles. Charles  
20 consented to a search of the hotel room. The search revealed a pair of faded men's blue jeans,  
21 similar in appearance to those of the bank robber and over \$2,000 in her purse. Photographs of  
22 these items follow:



1       19. During an interview of Charles she advised that she did rent a black Chevrolet  
2 Malibu in Reno earlier in the week and that she loaned the vehicle to JONES on Wednesday  
3 January 26, 2022 and Thursday January 27, 2022. Charles initially stated that she loaned the  
4 vehicle to Charles on the afternoon of January 27, however, after being asked how she got to  
5 Las Vegas that same day, she revised her statement and advised that she loaned JONES the  
6 vehicle around 8:00 a.m. or 9:00 a.m. on the 27<sup>th</sup> and that he picked her up around 10:00 a.m.  
7 or 11:00 a.m. that day.

8       20. Charles then consented to allow law enforcement to search the black Chevrolet  
9 Malibu. During the search, officers located a pair of black gloves, a black hood, a blue surgical  
10 mask and a pair of black sweatpants, all similar to those worn by the bank robber. A  
11 photograph of the items follows:

12

13

14

15

16

17

18

19

20

21

22

23

24



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17        21. JONES was taken into custody and transported to the Las Vegas  
18 Metropolitan Police Department where he was advised of his Miranda rights. JONES  
19 acknowledging that he was aware of these rights and was subsequently informed by the  
20 interviewing Agents that a gun was recovered near the target bank and that this gun was  
21 being tested for DNA evidence. JONES was asked if his DNA would be on the gun and he  
22 stated that it might be because he handles a lot of guns.

23        22. A bank audit revealed that Plumas Bank recorded a loss of \$10,028. During a  
24 search of the scene subsequent to the robbery, law enforcement recovered \$1,785, bringing the

1 actual bank loss to \$8,243. Plumas Bank was federally insured by the Federal Insurance  
2 Deposit Corporation (FDIC) at the time of the robbery.

## **CONCLUSION**

4       36.     Based on the above, I believe there is reasonable grounds and probable cause  
5 to believe that DEVON JONES has committed the crimes of Bank Robbery, in violation of  
6 Title 18, United States Code, Section 2113(a), and Discharging a Firearm During and In  
7 Relation to a Crime of Violence, in violation of Title 18, United States Code, Section  
8 924(c)(1)(A)(iii) and I therefore request an arrest warrant be issued.

Respectfully submitted,

  
ERIK G. ANDERSON  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to me by reliable electronic means pursuant to Federal Rule of  
Criminal Procedure 4.1 on this 31st day of January, 2022.

**HON. CAROL L. BALDWIN  
UNITED STATES MAGISTRATE JUDGE**